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March 22, 2023

Via: [CM/ECF](#)

The Honorable Jessica S Allen, U.S.M.J.  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street, Room 4015  
Newark, New Jersey 07101

Re: *D'Ambly v. Exoo, et al.*,  
Civil Case No.: 2:20-cv-12880-JMV-JSA  
*Request for Phone Conference Concerning Document Production*

Dear Judge Allen,

As you may recall this office represents Daniel D'Ambly (hereinafter "D'Ambly" or "Plaintiff") the Plaintiff in the above-referenced action. We request a telephone conference with Your Honor and counsel for defendants as soon as possible to resolve issues concerning Tribune Publishing, LLC ("Tribune") and the New York Daily News Company ("Daily News") (collectively "Defendant") discovery and document production.

Among the issues we seek Your Honor's assistance to resolve are defendant's refusal to produce electronic versions of electronically stored information, failure to produce documents and records in accordance with Plaintiffs Rule 34 requests, and defendant's withholding of documents and things under blanket claims of attorney-client privilege. Defendant's privilege log contains barebones explanations of the documents withheld. For instance, defendant's refusal to explain whether the entirety of any of the withheld document(s) contain advice from counsel, or whether the advice from counsel can be redacted and the non-privileged parts produced.

In an effort to resolve these issues the parties have met and conferred on at least three occasions, but the issues remain unresolved. I can be reached at (201) 777-3327 if further information is needed. Thank you for your attention to this matter.

Respectfully submitted,



*Attorney for Plaintiff*

cc: Emily Starbuck, *Attorney for Defendant*, [via CM/ECF](#)  
Joseph Mulherin, *Attorney for Defendant*, [via CM/ECF](#)